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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LORENA RAMIREZ,

Defendant.

CASE NO. 1:20-CR-00175-ADA-BAM

STIPULATION TO SET CHANGE OF PLEA
HEARING; ORDER

COURT: Hon. Ana de Alba

STIPULATION

1. The government, by and through United States Attorney Phillip A. Talbert and Assistant United States Attorney Justin J. Gilio, and the defendant Lorena Ramirez, by and through her counsel of record, Steven Crawford, hereby stipulate as follows.

2. The parties have reached a plea agreement in this case.

3. The parties ask that the matter as to defendant Francisco Ramirez be set for a change of plea before the Honorable Ana de Alba on March 27, 2023, at 8:30 AM.

4. The proposed change of plea date represents the earliest date that all counsel are available, taking into account counsels' schedules, defense counsels' commitments to other clients, and the court's available dates for a change of plea hearing. In addition, the public health concerns cited by General Orders 611, 612, 617, 618, and 620 and subsequent general orders presented by the evolving COVID-19 pandemic, an ends-of-justice delay is particularly apt in this case because counsel or other

relevant individuals have been encouraged to telework and minimize personal contact to the greatest extent possible.

a) Counsel for the defendants believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

b) The government does not object to the continuance.

c) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

d) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 10, 2023, to March 27, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 10, 2023

PHILLIP A. TALBERT
United States Attorney

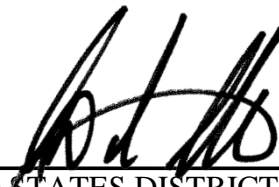
/s/ Justin J. Gilio
JUSTIN J. GILIO
Assistant United States Attorney

Dated: February 10, 2023

/s/Steven Crawford
Steven Crawford
Counsel for Defendant
LORENO RAMIREZ

IT IS SO ORDERED.

Dated: February 10, 2023


UNITED STATES DISTRICT JUDGE